

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:25-cv-00481-UA-JEP**

PHILIP SCHWAB,  
individually and on behalf of those  
similarly situated,

Plaintiff,

v.

RESEARCH TRIANGLE INSTITUTE  
d/b/a RTI INTERNATIONAL,

Defendant.

**CONSENT MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO CLASS ACTION  
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Local Civil Rule 6.1, and Standing Order No. 40, and with Plaintiff's consent, Defendant Research Triangle Institute d/b/a RTI International ("RTI") respectfully moves the Court for a twenty-one (21) day extension, through and including August 4, 2025, to respond to Plaintiff's Class Action Complaint. In support of this Motion, RTI states:

1. Plaintiff filed the Class Action Complaint (the "Complaint") on June 17, 2025.
2. RTI was served with the Complaint on June 23, 2025. The current deadline to respond to the Complaint is July 14, 2025. Thus, the time in which RTI must answer or otherwise respond to the Complaint has not expired.

3. RTI recently engaged the undersigned law firm to represent it in this litigation. RTI and its counsel need additional time to review the allegations in the Complaint and prepare an appropriate response.

4. For these reasons, good cause exists to allow RTI an additional twenty-one (21) days to respond to the Complaint, through and including August 4, 2025.

5. The undersigned has conferred with counsel for Plaintiff regarding this Motion. Counsel for Plaintiff consent to the extension requested in this Motion.

WHEREFORE, RTI respectfully requests that the Court enter an order extending the time in which it must answer or otherwise respond to the Complaint by twenty-one (21) days, through and including August 4, 2025.

This 3<sup>rd</sup> day of July, 2025.

/s/ Mark A. Hiller

Mark A. Hiller

N.C. Bar No. 50004

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